

August 15, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
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Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Tradin Organic Agriculture B.V./Tradin Organics USA Inc. supports the continued allowance of the following substances:

Name of Substance	Location on National List	Reason for continued allowance.	Supporting documents.
Citric acid	205.605a	Widely used in manufacture of oils and fats, not commercially available organic. Precipitation reagent, necessary to chelate metal ions and protect from oxidation.	Previous NOSB assessment still relevant.
Nitrogen	205.605a	Nitrogen extends the shelf life of packaged foods by preventing spoilage from oxidation, mould growth, moisture migration and insect infestation. Not commercially available organic.	Previous NOSB assessment still relevant.
Lecithin	205.605b /205.606	Widely used in processed food and in manufacture of ingredients for processed food. Essential as emulsifier in eg margarine.	Previous NOSB assessment still relevant.
Potassium carbonate	205.605b	Essential as alkalising agent in eg cocoa powder to improve taste, colour and solubility. It is the only available alkalising agent. Not commercially available organic.	Previous NOSB assessment still relevant.
Flavors	205.605a	Widely used in processed food and in manufacture of ingredients for processed food. Essential as aroma. Not commercially available organic, with a few exceptions.	Previous NOSB assessment still relevant.
Ascorbic acid	205.605b	Ascorbic acid is added to many foods for its nutritive value, but is also used extensively as an anti-oxidant, to prevent flavors and colors from being damaged by oxidation. It is often used in canned or frozen fruits to prevent the browning that accompanies oxidation. Not commercially available organic.	Previous NOSB assessment still relevant.

Tradin Organic Agriculture B.V./Tradin Organics USA Inc. is one of the worlds leading trading companies in basic organic commodities. We provide our worldwide customers with an extensive range of organic ingredients which we source a.o. through our own organic certified companies in China and Serbia and via many own managed projects like in Ghana, Vietnam, Bolivia, Indonesia, Bulgaria etc. etc. We sell through our sales companies in the USA, Germany, Austria, France, Mexico and China or directly out of our Dutch headquarters.

We have two sales offices in the USA: Tradin Organics USA Inc., located in Amherst and operating since 2000, and Tradin Organics USA in New York, operating since this year. We are fully certified according to The National Organic Programme of the United States Department of Agriculture.

Tradin Organic Agriculture B.V./Tradin Organics USA Inc. supports the continued allowance of the substances as mentioned in the National List and more specifically the ones mentioned above. We strongly believe that the organic market as such will be severely impacted with a substantial reduction in organic crops grown, not only in the USA, but worldwide, as well as with a dramatic reduction in availability of both processed organic products as organic ingredients/commodities.

Sincerely yours,

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